

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DOROTHY STANLEY, AS EXECUTRIX OF	:	
THE ESTATE OF HELEN A. RUNGE,	:	
Plaintiff	:	
	:	
	:	No. 05-10849-RGS
v.	:	(Judge Stearns)
	:	
WALTER J. KELLY, et al.,	:	CIVIL ACTION
Defendants	:	JURY TRIAL DEMANDED

**PLAINTIFF'S IDENTIFICATION OF
DEPOSITIONS TO BE OFFERED AT TRIAL
AND OBJECTIONS TO DEFENDANTS'
PROPOSED DESIGNATIONS OF DEPOSITIONS**

I. Plaintiff's Identification of Depositions to be Offered at Trial

Plaintiff respectfully identifies the following depositions for possible use at trial:

- A. Deposition of Walter J. Kelly, December 1 and 14, 2006, in its entirety;
- B. Deposition of Farrah Seidler, May 8, 2007, in its entirety; and
- C. Deposition of Sandra M. Porazzo-Perry, March 28, 2007, in its entirety.

II. Plaintiff's Objections to Defendant Kelly's Proposed Designations of Depositions

Defendant Kelly has proposed to designate portions of Gilbert Stanley's deposition transcript. Plaintiff objects to the following designations:

Page 42, Lines 2-4

Page 44, Line 25

Page 45, Lines 1-25

Page 46, Line 1

Page 49, Lines 1-25

Page 50, Lines 1-3

Page 51, Lines 24-25

Page 52, Lines 1-25

Page 53, Lines 1-8

Page 54, Lines 22-25

Page 55, Lines 1-23

Page 57, Lines 9-25

Page 58, Lines 1-25

Page 59, Lines 1-9 and 19-25

Page 60, Lines 1-15

Page 61, Lines 17-25

Page 62, Lines 1-12

Page 63, Lines 11-21

Page 64, Lines 24-25

Page 65, Lines 1-25

Page 67, Lines 3-7.

Page 80, Line 25

Page 81, Lines 1-3

Page 91, Lines 21-23

Page 92, Lines 20-25

Page 93, Lines 1-25

Page 94, Lines 2-25

Page 95, Lines 1-19

Page 96, Lines 17-25

Page 97, Lines 1-7 and 13-18.

III. Plaintiff's Objections to Defendant Sunbridge's Proposed Designations of Depositions

Defendant Sunbridge has proposed to designate portions of Gilbert Stanley's deposition transcript. Plaintiff objects to the following designations in Volume 1 of the transcripts:

49:19-50:3

91:24-95:199

6:23-99:15.

Respectfully submitted,

LATSHA DAVIS YOHE & MCKENNA, P.C.

Dated: June 16, 2008

By /s/ Glenn R. Davis
Glenn R. Davis
1700 Bent Creek Boulevard, Suite 140
Mechanicsburg, PA 17050
(717) 620-2424
gdavis@ldylaw.com
Pro Hac Vice

Blake J. Godbout, BBO #196380
BLAKE J. GODBOUT
& ASSOCIATES
33 Broad Street, 11th Floor
Boston, MA 02109
(617) 523-6677

Attorneys for Plaintiff, Dorothy Stanley,
Executrix of the Estate of Helen A. Runge

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document was served upon the attorney of record for each party by electronic transmission.

Michele Carlucci
George S. Rockas
Wilson Elser Moskowitz Edelman & Dicker LLP
155 Federal Street
Boston, MA 02110
michele.carlucci@wilsonelser.com
george.rockas@wilsonelser.com

Michael Williams
Lawson & Weitzen, LLP
88 Black Falcon Avenue, Suite 145
Boston, MA 02210-1736
mwilliams@lawson-weitzen.com

Dated: June 16, 2008

By /s/ Glenn R. Davis
Glenn R. Davis